

March 28, 2016

Hon. Frank Maas  
United States Magistrate Judge  
United States Courthouse  
500 Pearl St.  
Courtroom 20A  
New York, NY 10007-1312

***Re: In re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (FM) –  
Request to Deny Plaintiffs' Request for an Extension of the Court's Order  
Regarding the Particularized Showing of Risk of Harm to the Original Source***

Dear Judge Maas:

This firm represents the Muslim World League (“MWL”) and the International Islamic Relief Organization (“IIRO”) in the above-referenced matter. We write on behalf of MWL and IIRO in response to Plaintiffs’ request for “an extension of [the two week] time frame” ordered by the Court to provide a particularized showing of risk of harm to the source of the questioned documents. Docket No. 3244. In their March 25, 2016 correspondence Plaintiffs sought nearly three months to provide what had been represented to us as fact for months-- namely, that there are real safety concerns with regard to identifying the originating source of the documents, even on an eyes only basis-- without providing any basis for such a lengthy postponement. See March 25, 2016 Email from Robert Haefele to Waleed Nassar, attached as Exhibit 1. In response, we indicated a willingness to be reasonable and to agree to double the time this court found to be sufficient. See March 28, 2016 Email from Waleed Nassar to Robert Haefele, attached as Exhibit 2.

Plaintiffs still make no showing at all as to why this relatively straightforward task would take nearly three months and we ask that their request for this lengthy extension be denied. Presumably, as Plaintiffs have represented that there is physical danger to their source on numerous occasions over the past months, they had some basis for doing so that would not require 90 days to articulate. The long period requested suggests that this request is a pretext for delay and for conjuring up a claim of risk when the representation made to this Court had no substantive underlying basis.

Sincerely,



Eric L. Lewis

cc: All Counsel of Record